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6 Attorneys for Defendant and Cross-
7 Complainant ERALD ARMSTRONG

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

11	CHURCH OF SCIENTOLOGY,)	CASE NO.: C420153
12)	(SEVERED ACTION)
13	Plaintiff,)	
13	vs.)	RESPONSES OF CROSS-COMPLAINANT TO
14)	REQUEST FOR ADMISSIONS PROPOUNDED
14	GERALD ARMSTRONG,)	BY CROSS-DEFENDANT CHURCH OF
15)	SCIENTOLOGY OF CALIFORNIA
15	Defendants.)	
16	_____)
17	GERALD ARMSTRONG,)	
18)	
18	Cross-Complainant,)	
19	vs.)	
20)	
20	CHURCH OF SCIENTOLOGY OF)	
21	CALIFORNIA, et al.,)	
21)	
21	Cross-Defendant.)	
22	_____)

23 COMES NOW, cross-complainant Gerald Armstrong, and
24 responds to request for Admissions Propounded by Cross-
25 Defendant Church of Scientology of California and served on
26 October 2, 1986:

- 27 1. Deny.
28 2. Admit.

1 3. Admit.

2 4. Deny.

3 5. Cross-Complainant is unable to admit or deny
4 said request until cross-complainant is able to review the
5 mission file for Mission FMO No. 1407, which file is with
6 the court in Portland, Oregon. Therefore, cross-complainant
7 denies the same.

8 6. Deny.

9 7. Deny.

10 8. Deny.

11 9. Deny.

12 10. Objection, said request is vague, ambiguous
13 and unintelligible in that cross-complainant does not know
14 to what oral and written policies, directions and
15 requirements cross-defendant refers.

16 11. Deny.

17 12. Deny.

18 13. Admit.

19 14. Objection, said request is vague, ambiguous
20 and unintelligible in that cross-complainant does not
21 understand what is meant by the phrase "protection of
22 Scientology codes and procedures."

23 15. Objection, said request is vague, ambiguous
24 and unintelligible in that cross-complainant does not know
25 what is meant by the word "compensation."

26 16. Objection, said request is vague, ambiguous
27 and unintelligible in that cross-complainant does not know
28 what is meant by the word "compensation."

1 17. Objection, said request is vague, ambiguous
2 and unintelligible in that cross-complainant does not know
3 what is meant by the word "compensation."

4 18. Cross-Complainant admits that he provided
5 written declarations and affidavits, but denies the
6 remainder of the request for admission.

7 19. Deny.

8 20. Deny.

9 21. Cross-Complainant is unable to admit or deny
10 said request based upon lack of information and belief, and
11 thereon denies the same.

12 22. Deny.

13 23. Deny.

14 24. Admit.

15 25. Deny.

16 26. Deny.

17 27. Deny.

18 28. Objection, said request is vague, ambiguous
19 and unintelligible in that cross-defendant does not
20 understand the term "gave auditing." In the event cross-
21 defendant means that cross-complainant "audited" other
22 people, then without waiving said objection, cross-
23 complainant admits said request.

24 29. Objection, said request is vague, ambiguous
25 and unintelligible.

26 30. Objection, said request is vague, ambiguous
27 and unintelligible.

28 ///

VERIFICATION

STATE OF ~~Massachusetts~~ COUNTY OF SUFFOLK

I have read the foregoing RESPONSES OF CROSS-COMPLAINANT TO REQUEST FOR ADMISSIONS PROPOUNDED BY CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA and know its contents.

CHECK APPLICABLE PARAGRAPH

- I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.
- I am an Officer a partner _____ a _____ of _____

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

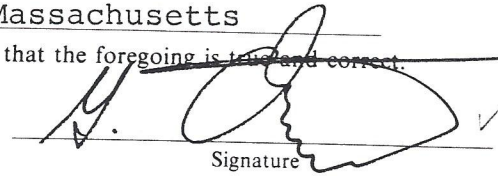
- I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on October 31, 1986, at Boston, Massachusetts

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

GERALD ARMSTRONG

Type or Print Name


Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)

Received copy of document described as _____

on _____ 19____.

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF _____

I am employed in the county of _____, State of California.

I am over the age of 18 and not a party to the within action; my business address is: _____

On _____ 19____, I served the foregoing document described as _____

_____ on _____
in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

- (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at _____, California.

Executed on _____, 19____, at _____, California.

- (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

Executed on _____, 19____, at _____, California.

- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing

and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on, 19, at California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Type or Print Name

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT

(other than summons and complaint)

Received copy of document described as

on 19.

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of LOS ANGELES, State of California.

I am over the age of 18 and not a party to the within action; my business address is: 5855 Topanga Canyon Blvd., Ste. 400, Woodland Hills CA 91367

On 11/3 1986, I served the foregoing document described as RESPONSES OF CROSS-COMPLAINANT

TO REQUEST FOR ADMISSIONS PROPOUNDED BY CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA

on the parties

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Donald C. Randolph, Esq. OVERLAND, BERKE, WESLEY, GITS, RANDOLPH & LEVANAS 2566 Overland Avenue, 7th Floor Los Angeles CA 90064

John G. Peterson, Esq. PETERSON & BRYNAN 8530 Wilshire Blvd. #407 Beverly Hills CA 90211

Robert Geller, Esq. GELLER & WEINBERG 80 Boylston Street Boston, Massachusetts 02116

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Woodland Hills, California.

Executed on, 19 86, at Woodland Hills, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

Executed on, 19, at, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

GLORIA STEWART

Type or Print Name

Signature